

Application No. 10/005,813  
Amendment dated February 22, 2006  
Reply to Office Action of November 22, 2005

Docket No.: 3313-0436P

### REMARKS

Applicants thank the Examiner for the thorough consideration given the present application. Claims 1-17 are currently being prosecuted. The Examiner is respectfully requested to reconsider his rejections in view of the amendments and remarks as set forth below.

#### Rejection Under 35 USC 103

Claims 1, 7-9, 11-15 and 17 stand rejected under 35 USC 103 as being obvious over Guinan (U.S. Patent 6,022,222) in view of Ligozat et al. (Publication). This rejection is respectfully traversed.

The Examiner states that Guinan shows a multimedia-aided verb tense teaching system including a language knowledge database for storing verb tense related multimedia data, a grammar rule data base which stores verb tense data and tense codes, an animation database which stores animation data and animation codes, an animation correspondence table which stores correspondences between entries in the grammar rule database and entries in the animation database. And it further discloses that verb tenses are related to time. The Examiner admits that Guinan does not disclose a time unit for storing correspondence between verb tense data and time, and a processing unit which receives a time related command from a user.

The Examiner relies on Ligozat et al. to disclose a system for teaching verb tenses using the notion of relating tenses to time including a time unit for storing correspondences between a verb tense data and the language knowledge data base in time and a processing unit which receives a time related command from the user. The Examiner feels it would have been obvious to one of ordinary skill in the art to modify Guinan to allow the user to input a time related command and generate a corresponding verb multimedia data to teach verb tenses.

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Applicants submit that the present claims are not obvious over either of these references or their combination. Applicants further submit that the Examiner has misconstrued the teachings of Guinan. Guinan does show an icon language system used in a computerized system in order to learn a natural language where icons are strung together in sentences. Thus, an icon is provided for each word and the language is learned by stringing the icons in a sentence so that the words of the foreign language may be learned in relation to the icon sentence. This system does not teach a relationship of tenses, but only shows the various tenses of a verb using shaded backgrounds and other icons to indicate the tense being used. This reference does not teach the concept of learning verb tenses by changing the time by the user.

In the present invention, the system is specifically designed to teach verb tense arrangements to a student. The student institutes an order to change the time and as a result the animation demonstrates in words and pictures the proper tense corresponding to that time change. This information is obtained from various data bases including tense data, a verb tense animation data base, a tense rule description database and other related codes to produce the animation upon the time being changed by the user.

Applicants submit that the Guinan reference does not show the features of amended claim 1. Thus, Guinan does not show specifically a language knowledge data base for storing verb tense related multimedia related data, nor does it show a grammar ruled data base which stores verb tense data and tense codes. It also does not show an animation database including an animation code list and a verb tense animation database. It also does not show an animation correspondence table or a time unit.

Ligozat et al. shows a system for teaching, which in one section discusses verb tenses. However, these discussions are basically in the abstract and do not show specific structure or steps for teaching the verb tenses in an actual system. The Examiner refers to page 478, Section 5, to show a time unit. While this section discusses a way of representing time, it is not seen that a time unit for storing correspondences in a system is shown. Likewise, while page 479 discusses changing the time state, there is no teaching of a processing unit which receives a time

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related command from a user and plays corresponding verb data. Accordingly, Applicants submit that Ligozat et al. does not teach these elements either.

Applicants submit that even if combined these two references do not teach the limitations of claim 1. Further, Applicants submit that there is no reason to combine these languages since Ligozat et al. seems to be involved with a discussion of the concepts without teaching any system elements for accomplishing the desired results. Further, Guinan is involved with an icon language system and does not relate well to tense changes when indicated by the user. Furthermore, Applicants submit that motivation is lacking for combining the two references. The Examiner's only indication of a need to combine the references is that students have difficulty learning tenses so that it would be obvious to combine these two different devices. Applicants submit that merely having a problem does not suggest a solution of combining two specific references. Accordingly, Applicants submit that motivation is lacking. For these reasons, Applicants submit that claim 1 is not obvious over the cited references.

Claim 2 has been amended to be independent and includes all of the limitations of claim 1 and further describes the grammar rule data base. Accordingly, Applicants submit that claim 2 is allowable for the same reasons recited above in regard to claim 1. Furthermore, Applicants submit that the references do not show the grammar rule data base in conjunction with the other data bases.

Claims 3-12 depend from either claim 1 or claim 2 and as such are also considered to be allowable. In addition, each of these claims recite other features that make them additionally allowable, including the use of various tense data in the various databases. Accordingly, these claims are additionally allowable.

Claim 13 is an independent method claim which corresponds to claim 1. In particular, this claim recites the steps of establishing relations between multimedia data and the time unit, receiving command from the user, determining the time corresponding to the command and playing the multimedia data corresponding to the time. This arrangement is not seen in the

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references since neither reference teaches the concept of utilizing a command from the user to determine the time and to therefore play multimedia data based on the time. Accordingly, Applicants submit that claim 13 is also allowable.

Claims 14-17 depend from claim 13 and as such are also considered to be allowable. Claims 15 and 16 have now been rewritten in independent form and include the limitations of claim 13 in addition to other limitations. Accordingly, Applicants submit that these claims are also allowable for the reasons recited above in regard to claim 13.

Claims 2-6 stand rejected under 35 USC 103 as being obvious over Guinan in view of Ligozat et al. and further in view Hemphill et al. (U.S. Patent 5,218,537). Claims 10 and 16 stand rejected under 35 USC 103 as being obvious over Guinan in view of Ligozat and further in view of Official Notice. These rejections are respectfully traversed.

The Examiner cites the Hemphill et al. reference to teach a system for teaching tenses that includes a tense rule description database. The Examiner feels that it would have been obvious to modify the combination of Guinan and Ligozat et al. to include a tense rule description database as taught by Hemphill et al. Applicants submit that even if Hemphill et al. does teach such a database, that these claims remain allowable as discussed above. It is further noted that the addition of the Hemphill et al. device does not overcome the deficiencies in the original two references as discussed above.

The Examiner relies on Official Notice to indicate that a user can connect to the system using the internet. Even if this is true, Applicants submit that these claims remain allowable based on their dependency from allowable independent claims.

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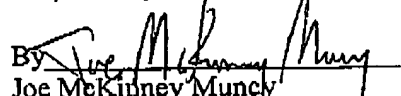
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Conclusion

In view of the above remarks, it is believed that the claims clearly distinguish over the patents relied on by the Examiner, either alone or in combination. In view of this, reconsideration of the rejections and allowance of all of the claims are respectfully requested.

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Respectfully submitted,

  
By Joe McKinney Muncy  
Joe McKinney Muncy  
Registration No.: 32,334  
BIRCH, STEWART, KOLASCH & BIRCH, LLP  
8110 Gatchouse Road  
Suite 100 East  
P.O. Box 747  
Falls Church, Virginia 22040-0747  
(703) 205-8000  
Attorney for Applicant